

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOANNA WILSON, as Independent Administrator
of the Estate of Areon J. Marion, Deceased

Plaintiff,

vs.

COOK COUNTY, ILLINOIS, et al.,

Defendants.

Case No.: 22-cv-6886

Honorable Andrea R. Wood

DEFENDANTS' SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants, COOK COUNTY, ILLINOIS., COOK COUNTY SHERIFF'S OFFICE, and OFFICER B. VARGAS ("**Defendants**"), by their attorney, KIMBERLY M. FOXX, State's Attorney of Cook County, through her Assistant State's Attorneys ANTONIO LEE and MIA BUNTIC, pursuant to Federal Rule of Civil Procedure 6(b), file this Second Motion for Extension of Time to respond to Plaintiff JOANNA WILSON'S, AN INDEPENDENT ADMINISTRATOR OF THE ESTATE OF AREON J. MARION, ("**Plaintiff**") Complaint within 14 days, up to and including February 27, 2023, and state as follows:

1. On December 15, 2022, Defendants filed their first Motion for Extension of Time to respond to Plaintiff's Complaint seeking the extension in an effort to resolve issues regarding service of process for all named parties, and sufficient time to respond to Plaintiff's lengthy complaint.

2. Since then, counsel for Cook County has been in touch with Plaintiff's counsel and has made significant progress regarding serving individual defendants. However, due to scheduling issues, including preparation for a three-day trial that was supposed to take place February 1, 2023,

and a week-long family vacation with very limited internet service, counsel for Cook County has not had sufficient time to prepare a responsive pleading to Plaintiff's Complaint.

3. For this reason, Defendants now request a short second extension of time of fourteen days in which to prepare a responsive pleading.

4. This request is made in good faith and to preserve judicial economy, and not for purposes of undue delay.

5. Counsel for Defendants conferred with Plaintiff's counsel, who has no objection to this request.

WHEREFORE, Defendants respectfully request this Honorable Court grant the following relief:

1. An extension of time of 14 days up to February 27, 2023, to respond to Plaintiff's Complaint; and
2. Grant any other relief this Court deems necessary and just.

Dated: February 13, 2023.

Respectfully Submitted,

KIMBERLY M. FOXX
State's Attorney of Cook County

By: /s/ Antonio Lee .

Antonio Lee
Assistant State's Attorneys
500 Richard J. Daley Center
Chicago, Illinois 60602
(312)603-5439
Antonio.Lee@cookcountyil.gov
On behalf of **SHERIFF's Office and Officer Vargas**

KIMBERLY M. FOXX

State's Attorney of Cook County

By: /s/ Mia Buntic

Mia Buntic

Assistant State's Attorney

(312)603-1434

Mia.buntic@cookcountyil.gov

On behalf of **COOK COUNTY**

CERTIFICATE OF SERVICE

The undersigned certifies that, on February 13, 2023 in accordance with the Federal Rules of Civil Procedure, Local Rule 5.5 and the General Order on Electronic Case Filing, she served this notice, with attachments, on the persons named below by electronic mail prior to 5:00 p.m..

James C. Pullos

Clifford Law Offices, P.C.

120 N. LaSalle Street

Suite 3600

Chicago, Illinois 60602

(312) 899-9090

jcp@cliffordlaw.com

Attorney for Plaintiff

s/Mia Buntic

Mia Buntic

Assistant State's Attorney

(312)603-1434

Mia.buntic@cookcountyil.gov

On behalf of **COOK COUNTY**